

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MAUREEN O'DONNELL and RICHARD
DANIEL McWRIGHT, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

TIMESHARE RELIEF, INC.; ISOSCELES
FOUNDATION; TRANSFER AMERICA,
LLC; ASTON MARKETING
GROUP, INC.; DAVID MACMILLAN;
and CINDY MACMILLAN,

Defendants.

Case No.

AFFIDAVIT OF BETH E. TERRELL

I, Beth E. Terrell, on oath, depose and state that:

1. I am an attorney with offices located at 936 North 34th Street, Suite 300, Seattle, Washington, 98103.

2. I am an active member of the Bars of the States of California and Washington.

The following outlines my state and federal court admissions:

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| California State Bar | 12/01/1995 |
| Washington State Bar | 05/21/1997 |

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| U.S. District Court, Western District of Washington | 07/28/1997 |
| U.S. District Court, Eastern District of Washington | 01/12/2001 |
| Ninth Circuit Court of Appeals | 01/22/2001 |
| U.S. District Court, Northern District of California | 04/05/2005 |
| U.S. District Court, Central District of California | 03/30/2009 |
| U.S. District Court, Eastern District of California | 09/24/2010 |
| U.S. District Court, Southern District of California | 09/20/2011 |

3. I am a member in good standing in every jurisdiction where I have been admitted.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
5. I am familiar with the facts and legal issues presented in this case.
6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.
7. This affidavit is executed in connection with Plaintiffs' Motion, by and through counsel, John Roddy, to admit me *pro hac vice* for the purpose of acting as co-counsel of record for Plaintiffs Richard Daniel McWright and Maureen O'Donnell in connection with this matter.